

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Saliah ALGAHMI

Case No. Case: 2:23-mj-30257  
Assigned To : Unassigned  
Assign. Date : 6/16/2023  
SEALED MATTER (LH)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 8, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(4)	Adjudicated as a mental defective or who has been committed to a mental institution
18 U.S.C. § 922(o)	Transfer or possess a machinegun
18 U.S.C. § 922(j)	Possess any stolen firearm or ammunition
18 U.S.C. § 922(k)	Firearm which has had the importers or manufacturers serial number removed, obliterated, or altered
26 U.S.C. § 5861(d)	Possession of a firearm that is unregistered in the National Firearms Registration and Transfer Record "NFRTR"
18 U.S.C. § 716	Knowingly receives in interstate a counterfeit official insignia badge

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.



Complainant's signature

Special Agent Randall Olsen, ATF

Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: June 16, 2023

City and state: Detroit, Michigan



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

**ADDIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Randall B. Olsen, being first duly sworn, hereby depose and state the following:

**INTRODUCTION**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice since May 2022. I am currently assigned to Detroit Group VII, investigating various federal firearm violations. Prior to being employed as a Special Agent, I was a Police Officer with the Detroit Police Department (DPD) for over seven (7) years, and the Grosse Pointe Park Department of Public Safety (GPPDPS) for over one (1) year. During that time, I was assigned to DPD's Special Operations unit, as well as the Special Repose Team (SRT). I am a graduate of the ATF Special Agent Basic Training program and of the Detroit Police Department's Police Academy. I have also earned a Bachelor of Science in Criminal Justice with a concentration in Supervision and Management. During my employment with ATF, DPD, and GPPDPS, I have participated in numerous criminal investigations focused on firearms, armed drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined

herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation.

3. As set forth below, probable cause exists that on or about June 8, 2023, in the Eastern District of Michigan, Saliah ALGAHMI (DOB XX/XX/1986) (“ALGAHMI”) violated 18 U.S.C. § 922(g)(4) (adjudicated as a mental defective or who has been committed to a mental institution), 18 U.S.C. § 922(o) (transfer or possess a machinegun), 18 U.S.C. § 922(j) (possess any stolen firearm or ammunition), 18 U.S.C. § 922(k) (firearm which has had the importers or manufacturers serial number removed, obliterated, or altered), 26 U.S.C. 5861(d) (possession of a firearm that is unregistered in the National Firearms Registration and Transfer Record “NFRTR”), and 18 U.S.C. 716 (knowingly receives in interstate a counterfeit official insignia badge).

### **PROBABLE CAUSE**

4. On October 5, 2012, ALGAHMI was petitioned by Michigan Probate Court, County of Wayne, case number 2012-781139-MI, to be hospitalized for a period not lasting more than sixty (60) days. The Petition for Hospitalization elaborated in detail and established a determination that ALGAHMI was mentally ill and suffered from bipolar disorder. The Initial Order Following Hearing On Petition for Admission for involuntary hospitalization found: “[b]y clear and convincing evidence, the individual is a person requiring treatment because the

individual has a mental illness, and as a result of that mental illness [x]a. can reasonably expected within the near future to intentionally or unintentionally seriously physically injure self or others, and has engaged in an act or acts or made significant threats that are substantially supportive of the expectation.” Therefore, any possession of firearms and or ammunition would be in direct violation of 18 U.S.C. 922(g)(4).

5. On May 19, 2023, at approximately 2:41 a.m., the Detroit Police Department (DPD) responded to a 911 emergency call, pertaining to an aggravated / felonious assault that took place in the alley located at Sharon and Mandale, Detroit, Michigan. DPD officers were “flagged down” by an adult Victim, who told the police that ALGAHMI fired one round at her before he fled the scene. DPD located a spent 9mm shell casing in the area of where the Victim said that ALGAHMI had fired the gun. DPD also determined that the Victim and ALGAHMI were married and lived together. A witness independently corroborated the assault. The Victim identified ALGAHMI as the person who shot at her, and she told DPD where ALGAHMI lived.

6. On June 8, 2023, DPD executed a state search warrant located at 19511 Hanna Street, Melvindale, Michigan (Target Location), within the Eastern District of Michigan, stemming from the May 19, 2023, aggravated assault / felonious assault investigation. During the search warrant, DPD recovered

eighteen (18) firearms, one (1) counterfeit Drug Enforcement Agency (DEA) Federal law enforcement official insignia “badge,” one (1) counterfeit Department of Defense (DOD) Federal law enforcement official insignia “badge,” and other miscellaneous items. Based on my training and experience, the badges so resemble a police badge that it would deceive an ordinary individual into believing it was genuine. Based on the investigation, on November 13, 2022, ALGAHMI was a co-signee for a package believed to be delivered from China to the Target Residence that was described in the shipping manifest as a plastic badge.

7. At the time of the search warrant ALGAHMI was not present at the Target Location. His juvenile teenage son was contacted while leaving the Target Location, and he told DPD that ALGAHMI had left the residence the previous evening. Inside of ALGAHMI’s residence, law enforcement found:

- a. DPD located mail addressed to ALGAHMI at the Target Location in the mailbox and in the kitchen. DPD also had previously confirmed using a law enforcement database that ALGAHMI is registered at the Target Location. The Target Location is also listed on ALGAHMI’s driver’s license.
- b. DPD located one (1) DPMS Panther Arms, Model: MOD A-15, Serial: F110159K, located in the upstairs bedroom on the bed.

- c. DPD located the following six (6) items: a white and gray Easton bag containing live ammunition and firearms accessories that was located in the only second floor bedroom, immediately off the staircase landing and next to the attic access room; Smith and Wesson, Model: M&P 15, Serial: TT36700 located in the only second floor bedroom, immediately off the staircase landing and next to the attic access room; Smith and Wesson, Model: M&P 15, Serial: TM37121 located in the only second floor bedroom, immediately off the staircase landing and next to the attic access room; Smith and Wesson, Model: M&P 15, Serial: TJ29142 located in the only second floor bedroom, immediately off the staircase landing and next to the attic access room; Smith and Wesson, Model: M&P 15, Serial TS17553 located in the only second floor bedroom, immediately off the staircase landing and next to the attic access room; and Taurus, Model: G2C, Serial: ADE288908 located in the sole bedroom in the basement.
- d. DPD located the following four (4) items: Romarm/Cugir, Model: Mini Draco, Serial: PD-8538-2016, located next to the living room couch; Block, Model: 26, Serial: CNZ159, located in the living room on the TV stand inside of a brown holster; Beretta, Model 92fs, Serial:

BER035667, located laying in an open safe in the living room; and  
DEA badge, located in the kitchen cabinet above the stove.

- e. DPD located the following five (5) items: Masterpiece Arms, Model: Defender, Serial: Obliterated, located in the upstairs bedroom; Sarsilmaz, Model: B6C, Serial: T1102-17G01163, located in the upstairs bedroom; Black AR style pistol with no apparent serial number, located in the upstairs bedroom; Hi-point, Model: 995, Serial: F199802, located in the upstairs bedroom; and Mossberg, Model 500A, Serial: R419441, located in the upstairs bedroom.
- f. DPD located the following six (6) items: duffel bag located within the first-floor main hallway, containing: Taurus, Model: 850, Serial: UG19479; Ruger, Model: Security-Six, Serial: 155-67307; Glock, Model: 23, Serial: MFD549; Battle Arms, Model: Workhorse, Serial: WP12291; and gold Department of Defense badge with number “212.”
- g. DPD located the following items: twelve (12) 50 Cent coins and one (1) One Dollar Coin, located in the pocket of the Easton Backpack; and One (1) open plastic bag of suspected marijuana located in the side pocket of duffel bag.



8. Below is a photograph of the firearms and badges after the ATF assisted in processing the evidence:



9. I conducted a firearm registration and wanted search query via the Law Enforcement Information Network (LEIN) database. The LEIN results revealed four (4) of the seized firearms were identified as stolen (1. Smith & Wesson, Model: M&P 15, Serial: TJ29142; 2. Romarm/Cugir, Model: Mini Draco, Serial: PD85382016; 3. Glock, Model: 23, Serial: MFD549 (equipped with a fully automatic conversion device commonly referred to as a “switch”); and 4. Taurus, Model: G2C, Serial: ADE288908). I conducted a functionality check of the



firearms to identify if their operability was in a Semi-Automatic or Fully Automatic function and two of the firearms operated in a fully automatic function (Glock, Model 23, Serial: MFD549 that is equipped with a fully automatic conversion device commonly referred to as a “switch;” and Masterpiece Arms, Model: Defender, Serial: obliterated).

10. One firearm recovered from ALGAHMI’s residence on June 8, 2023, a Glock 26 pistol, along with the 9mm casing recovered on May 19, 2023, were evaluated using the National Integrated Ballistic Information Network (NIBIN). NIBIN technology compares images of submitted ballistic evidence from shooting scenes and recovered firearms and produces a list of possible similar results. A NIBIN lead is an unconfirmed, potential association between two or more pieces of firearm ballistic evidence and is based on a correlation review of the digital images in the NIBIN database. The evidence in this case produced a NIBIN lead.

11. I conducted a query of the NFRTR of the two suspected fully automatic firearms to establish if either were properly registered and the results revealed neither were registered. While I was reviewing the firearms as evidence, I observed one firearm had an obliterated serial number (Masterpiece Arms, Model: Defender, Serial: obliterated).

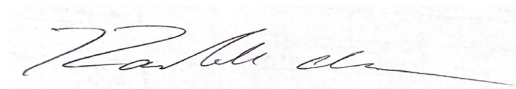
12. One firearm, the Sarsilmaz, Model: B6C, Serial: T110217G01163, was registered to ALGAHMI's wife. None of the firearms were lawfully registered to ALGAHMI.

13. On June 12, 2023, Interstate State Nexus Expert, Special Agent Kevin Rambus advised me, based on a verbal description and without physically examining the firearms, that all 18 of the firearms seized were manufactured outside the state of Michigan and therefore had traveled through interstate and/or foreign commerce.

### **CONCLUSION**

14. I believe probable cause exists that on or about June 8, 2023, within the Eastern District of Michigan, ALGAHMI violated 18 U.S.C. § 922(g)(4) by being in possession of firearms, following his court ordered hospital admittance due to his mental defective status. Additionally, ALGAHMI was in possession of unregistered machine guns, in violation of 18 U.S.C. § 922(o) and 26 U.S.C. § 5861(d). ALGAHMI's possession of firearms reported as stolen and that have obliterated and/or defaced serial numbers is in violation of 18 U.S.C. §§ 922(j) and (k), respectively. The possession of the suspected identifiable counterfeit DEA and DOD insignia "badges" are in violation of 18 U.S.C. § 716.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Randall B. Olsen", written over a horizontal line.

Randall B. Olsen, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

Subscribed and sworn before me and/or  
by reliable electronic means.

A handwritten signature in black ink, appearing to read "Kim J Altman", written over a horizontal line.

Hon. Kimberly Altman  
United States Magistrate Judge

Date: June 16, 2023